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*Counsel for the Debtor*

**UNITED STATES BANKRUPTCY COURT  
THE SOUTHERN DISTRICT OF NEW YORK**

In re:

56 MILBANK AVENUE, LLC,

Debtor.

Chapter 11

Case No. 15-22710 (RDD)

**CERTIFICATE OF NO OBJECTION REGARDING DOCKET NO. 35  
(RESOLUTION OF INFORMAL OBJECTION)**

Pursuant to Local Rule 9075-2, the undersigned hereby certifies that I have received no formal objection, other responsive pleading or request for hearing with to the *Debtors' Motion to Extend Exclusivity Period for Filing a Chapter 11 Plan and Disclosure Statement* (the "Motion") [ECF Doc. # 35], filed on September 16, 2015, and served on September 16, 2015 upon the persons indicated and the manner indicated on the Certificate of Service filed on June 16, 2015 [ECF Doc. # 37].

The undersigned further certifies that I have reviewed the Court's docket in this case as of 8:30 a.m. (prevailing Eastern Time) on October 19, 2015 and no objection, other responsive pleading or request for hearing with respect to the Motion appears on the docket. Pursuant to the Notice of Motion annexed to the Motion, objections were to be filed and served no later than October 14 at 4:00 pm (prevailing Eastern Time), and such Notice of Motion

provides that the Court may grant the relief requested in the Order without a hearing if no objections are filed.

The Debtor received one informal objection from its secured lender, SDF77 Greenwich LLC ("SDF"). In response to the informal objection, the Debtor has agreed with SDF to reduce the Exclusive Filing Period (as defined in the Motion) requested to December 4, 2015 from December 16, 2015 and its Exclusive Solicitation Period (as defined in the Motion) requested to February 2, 2016 from February 16, 2016. As set forth in the proposed order as agreed upon between the Debtor and SDF, attached as Exhibit A hereto, all parties reserve their rights to seek extensions or reductions. The US Trustee has indicated it has no objection to the agreed-upon extensions.

The undersigned further certifies that this Certificate of No Objection Regarding Docket Number 35 is being filed not less than forty-eight (48) hours after expiration of the October 14, 2015 deadline.

It is hereby respectfully requested that the proposed order attached to the Motion be entered at the earliest convenience of the Court.

Dated: New York, New York  
October 19, 2015

**OLSHAN FROME WOLOSKY LLP**

By: /s/ Jonathan T. Koevary

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*Counsel for the Debtor and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT  
THE SOUTHERN DISTRICT OF NEW YORK**

In re:

56 MILBANK AVENUE, LLC,

Debtor.

Chapter 11

Case No. 15-22710 (RDD)

**ORDER EXTENDING THE EXCLUSIVE PERIODS TO FILE A  
CHAPTER 11 PLAN AND TO SOLICIT ACCEPTANCES  
THERE TO PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE**

Upon the motion, dated September 16, 2015 (the “Motion”)<sup>1</sup> of the above captioned debtor as debtor in possession (the “Debtor”), for the entry of an order extending the exclusive periods to file a chapter 11 plan and to solicit acceptances thereto; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the parties listed therein, and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in the Motion (the “Hearing”); and the appearances of all interested parties having been noted in the record of the Hearing; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtor, the Debtor’s estate, creditors, and parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED to the extent set forth herein.
2. The Debtor's Exclusive Filing Period shall be extended through and including December 4, 2015.
3. The Debtor's Exclusive Solicitation Period shall be extended through and including February 2, 2016.
4. All parties' rights are reserved with respect to any further extensions or reductions of the Exclusive Filing Period and/or the Exclusive Solicitation Period.
5. This Court shall retain jurisdiction to interpret and enforce this Order.

Dated: \_\_\_\_\_, 2015  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE